

GROUP EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

| | | |
|---|---|------------------------------|
| Protect Our Parks, Inc.; Charlotte Adelman; |) | |
| Maria Valencia and Jeremiah Jurevis; |) | No. 18-cv-03424 |
| Plaintiffs, |) | |
| v. |) | Honorable John Robert Blakey |
| |) | |
| Chicago Park District and City of Chicago, |) | Jury Demanded |
| Defendants. |) | |

PLAINTIFFS' SECOND REQUEST TO PRODUCE TO CITY OF CHICAGO

Now come the Plaintiffs, Protect Our Parks, Inc.; Charlotte Adelman; Maria Valencia and Jeremiah Jurevis, through their undersigned attorneys, and pursuant to Rule 34 of the Federal Rules of Civil Procedure request that the Defendant, City of Chicago, produce the following documents, electronically stored information and tangible things at the law offices of Roth Fioretti, CCL 311 S. Wacker Drive, Suite 2470, Chicago Illinois within 30 days from service of this Request to Produce.

DEFINITIONS

For purposes of this Request to Produce, the following definitions shall apply unless otherwise specifically indicated:

1. The word "document" shall mean any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including, but not limited to, correspondence, memoranda, notes, messages, letters, electronic mail (emails), facsimiles, telegrams, teletyped messages, bulletins, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, computer printouts, schedules, affidavits, contracts, transcripts, surveys, graphic representations of any kind, photographs, graphs, microfilm, video tapes, tape recordings, motion pictures or other film and all electronically stored information.
2. "Person" means any natural person or any legal entity, including, but not limited to, a corporation, partnership and unincorporated association, and any officer, director, employee, agent or other person acting or purporting to act on its behalf.
3. "And" and "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.

4. "Each" includes both "each" and "every."
5. The singular and masculine gender shall, respectively, include the plural and feminine gender, and vice versa.
6. "Relating to," "relates to," and "regarding" mean, without limitation, relating to, concerning, constituting, mentioning, referring to, describing, summarizing, evidencing, listing, relevant to, demonstrating, tending to prove or disprove, or explain.
7. "Communication" or "communications" includes, without limitation, in-person or telephone conversations, facsimiles, letters, electronic mail (email), telegrams, telexes, text messages, tapes or other sound recordings, or other means of transmitting information from one source to another.

REQUEST FOR PRODUCTION

Produce all of the following documents and tangible things in your possession, custody or control related to:

1. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Adler Planetarium is operated in Burnham Park.
2. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Field Museum is operated in Burnham Park.
3. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the John G. Shedd Aquarium is operated in Burnham Park.
4. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Art Institute of Chicago is operated in Grant Park.
5. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the National Museum of Mexican Art is operated in Harrison Park.
6. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Institute of Puerto Rican Arts and Culture is operated in Humboldt Park.
7. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Museum of Science and Industry is operated in Jackson Park.
8. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Museum of Contemporary Art is operated in Lake Shore Park.

9. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Peggy Notebaert Nature Museum is operated in Lincoln Park.
10. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the Chicago History Museum is operated in Lincoln Park.
11. Any and all documents, including but not limited to lease agreements, use agreements, deeds, or other documents of any nature related to the terms and conditions under which the DuSable Museum of African American History is operated in Washington Park.

Respectfully submitted,

/s/ Mark D. Roth

Mark D. Roth

Roth Fioretti, LLC
Mark Roth
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rwfchicago@yahoo.com

PROOF OF SERVICE

I, Mark Roth, an attorney, certify that I served the **Plaintiffs' Second Request To Produce to the City of Chicago** by email transmission from mark@rothfioretti.com to the following persons at their email addresses shown below on or before 5:00 pm. on October 30, 2018.

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(*Defendant*)

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City Of Chicago
(*Defendant*)

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/s/Mark Roth
Mark Roth

Mark Roth

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**PLAINTIFFS' SECOND REQUEST TO PRODUCE TO THE CHICAGO PARK
DISTRICT**

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Respectfully submitted,

/s/ Mark D. Roth

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PROOF OF SERVICE

I, Mark Roth, an attorney, certify that I served the **Plaintiffs' Second Request To Produce to the Chicago Park District** by email transmission from mark@rothfioretti.com to the following persons at their email addresses shown below on or before 5:00 pm. on October 30, 2018.

Richard W. Burke, -

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